

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

C.R.M.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:20-cv-404
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	
	)	

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**MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Civil Rule 5(C) and the Stipulated Protective Order (Dkt. No. 27), Defendant respectfully moves the Court for leave to file under seal certain limited portions of Defendant's memorandum in support of its renewed motion to dismiss, as well as Defendant's Exhibit ("DEX") 2, 3, 7, 8, 9, 11, 12, and 14 to Defendant's renewed motion to dismiss (Dkt. Nos. 55). DEX 2, 3, 7, 8, and 9 are exhibits designated by Plaintiff as confidential and subject to the protective order. DEX 11, 12, and 14 and portions of Plaintiff's medical records that Defendant designated as confidential and subject to the protective order out of an abundance of caution and as a courtesy to Plaintiff, as they relate exclusively to Plaintiff's medical history. Accordingly, pursuant to the Stipulated Protective Order, the memorandum supporting sealing and proposed order concerning these exhibits must be filed by Plaintiff. Unless Plaintiff supports sealing of these materials, Defendant does not oppose filing the documents on the public record.

Dated: December 14, 2020

Respectfully submitted,

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

By:                     /s/                      
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